

171671

September 9, 1985

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Mr. Arthur S. Kawatachi, Chief
Information Unit
U.S. EPA - Region V
RCRA Activities

Re: Permit Application Withdrawal Letter
Facility Name: Rexnord
U.S. EPA ID No.: ILD 005455571

Dear Mr. Kawatachi:

Rexnord Inc. requests withdrawal of its Part A application submitted November 3, 1980 for its Bearing Operation located at 2400 Curtiss Street, Downers Grove, Illinois 60515.

Enclosed herewith is a detailed explanation why the application should be withdrawn. It is signed by Mr. Leroy J. Ruesch, our General Manager of Plant Operations at the Bearing Operation. Also enclosed herewith is a Closure Plan for the treatment, storage, or disposal of hazardous waste activities at the Bearing Operation.

If you have any questions regarding this request for permit application withdrawal or need any further information to effect it, please communicate with:

Mr. Aaron L. Hardt
Environmental Counsel
Rexnord Inc.
Legal Department
350 North Sunny Slope
Brookfield, WI 53005

(414) 797-5687

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who

(Public notice of the hearing may be given at the same time as notice of the opportunity for the public to submit written comments, and the two notices may be combined.) The Regional Administrator will approve, modify, or disapprove the plan within 90 days of its receipt. If the Regional Administrator does not approve the plan, the owner or operator must modify the plan or submit a new plan for approval within 30 days. The Regional Administrator will approve or modify this plan in writing within 60 days. If the Regional Administrator modifies the plan, this modified plan becomes the approved closure plan. The Regional Administrator's decision must assure that the approved closure plan is consistent with §§ 265.111, 265.113, 265.114, and 265.115 and the applicable requirements of §§ 265.197, 265.228, 265.280, 265.310, 265.351, 265.381 and 265.404. A copy of this modified plan must be mailed to the owner or operator. If the owner or operator plans to begin closure before November 19, 1981 he must submit the closure plan by May 19, 1981.

§ 265.113 Closure; time allowed for closure.

(a) Within 90 days after receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, the owner or operator must treat, remove from the site, or dispose of on-site all hazardous wastes in accordance with the approved closure plan. The Regional Administrator may approve a longer period using the procedures under § 265.112(d) if the owner or operator demonstrates that:

(1X1) The activities required to comply with this paragraph will, of necessity, take him longer than 90 days to complete; or

(1IXA) The facility has the capacity to receive additional wastes;

(B) There is a reasonable likelihood that a person other than the owner or operator will recommence operation of the site; and

(C) Closure of the facility would be incompatible with continued operation of the site; and

(2) He has taken and will continue to take all steps to prevent threats to human health and the environment.

(b) The owner or operator must complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, if that is later. The Regional Administrator may approve a longer closure period using the procedures under § 265.112(c) if the owner or operator demonstrates that:

(1X1) The closure activities will, of necessity, take him longer than 180 days to complete; or

(1IXA) The facility has the capacity to receive additional waste;

(B) There is a reasonable likelihood that a person other than the owner or operator will recommence operation of the site;

(C) Closure of the facility would be incompatible with continued operation of the site; and

(2) He has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

(Comment: Under paragraphs (a)(1X1)(i) and (b)(1X1)(i), of this Section, if operation of the facility is recommenced, the Regional Administrator may defer completion of closure activities until the new operation is terminated)

§ 265.114 Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures must have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

§ 265.115 Certification of closure.

When closure is completed, the owner or operator must submit to the Regional Administrator certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

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manage the system, or those persons responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Vance A. Smith
Secretary and Legal Counsel
for Rexnord Inc.

/kk

Enc.

cc: A. Hardt
L. Ruesch

ALH:090985102R